



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SA:RP/SN

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 28, 2014

By Email and ECF

Robert Soloway, Esq.
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100 Lafayette Street
New York, New York 10013

Re: United States v. Ronald Herron
Criminal Docket No. 10-615 (NGG)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby supplements the expert notice previously provided in this case. The government intends to call the following expert witnesses pursuant to Federal Rule of Evidence 702 to testify on the following subjects:

Medical Examiners

- Dr. Charles Catanese, a medical examiner, will testify about the autopsy he performed on the body of Frederick Brooks, the victim of the murder charged as Racketeering Act Seven and in Counts Five, Six, and Eight of the superseding indictment, and about his conclusions as to the cause of Brooks's death.
- Dr. Aglae Charlot, a medical examiner, will testify about the autopsy she performed on the body of Richard Russo, the victim of the murder charged as Racketeering Act Six and in Counts Twelve, Thirteen, and Fifteen of the superseding indictment, and about her conclusions as to the cause of Russo's death.
- Dr. Floriana Persechino, a medical examiner, will testify about the autopsy she performed on the body of Victor Zapata, the victim of the murder charged as Racketeering Act Nine and in Counts Eighteen, Nineteen, and Twenty-one of

the superseding indictment, and about her conclusions as to the cause of Zapata's death.

Please note that reports generated in connection with the above-referenced autopsies were disclosed to the defense during discovery and will be disclosed again, along with updated curricula vitae, as part of the government's disclosures pursuant to Title 18, United States Code, Section 3500.

Ballistics/Firearms Experts

- NYPD Detective Jeffrey Baum, an expert in firearms and ballistic analysis, will testify regarding his analysis of ballistics evidence recovered from the scene of the shooting of John Doe #3, charged as Racketeering Act Seven of the superseding indictment.
- NYPD Detective Rodney Rodriguez, an expert in firearms and ballistics analysis, will testify regarding his analysis of a firearm recovered from Jorge Mejia on or about February 26, 2009.
- NYPD Detective James Valenti, an expert in firearms and ballistic analysis, will testify regarding his analysis of ballistics evidence recovered from the scenes of (1) the May 9, 2008 murder of Richard Russo; (2) the November 9, 2008 shooting of Jorge Mejia; and (3) the September 27, 2009 murder of Victor Zapata.
- NYPD Detective Mark Basoa, an expert in firearms and ballistic analysis, will testify regarding his analysis of ballistics evidence recovered from the scene of the June 16, 2001 murder of Frederick Brooks.
- Special Agent Ismael Hernandez of the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), an expert in the movement of firearms and ammunition in interstate commerce, is expected to testify that firearms and ammunition recovered from the defendant on October 1, 2009, and October 5, 2010, were manufactured outside the state of New York.

Please note that paperwork generated in connection with the above-referenced ballistics analyses was disclosed to the defense during discovery and will be disclosed again, along with updated curricula vitae, as part of the government's disclosures pursuant to Title 18, United States Code, Section 3500.

Chemists

The government intends to call the following drug chemists from the New York City Police Department Police Laboratory to testify as expert witnesses about the composition of narcotics recovered in connection with this case:

- Norma Hamilton
- Heather Palumbo
- Anthony Chiusano

The government reserves the right to call substitute expert witnesses, as well as to call additional expert witnesses, and will provide advance notice of any intent to do so.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
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cc: Clerk of Court (NGG) (via ECF)